

Federal Defenders OF NEW YORK, INC.

Leonard F. Joy
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Via Facsimile: (212) 805-6304

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Appeals Bureau
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Barry D. Leiwant
Attorney-in-Charge

June 10, 2008

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: JUN 11 2008

Re: United States v. Rosemary Borrel
08 Cr. 348 (PAC)

Dear Judge Crotty:

I write on behalf of my client, Rosemary Borrel, to respectfully request that the Court modify the bail restrictions imposed by the Honorable Gabriel W. Gorenstein on January 24, 2008. In particular, I request that Ms. Borrel's pretrial supervision be modified from "strict" supervision to "regular" supervision. Ms. Borrel's Pretrial Services supervisor, Mr. Luis Piedra, has requested that her supervision be so modified. (I have also left a message for Assistant United States Attorney Steve Kwok seeking his consent.)

Ms. Borrel is over seven months pregnant, and is due to give birth in August. On June 9, 2008, I received a call from Mr. Piedra, requesting that I seek modification of Ms. Borrel's pretrial supervision. Mr. Piedra explained that Ms. Borrel's medical condition made it difficult for her to be kept under strict supervision – for example, Ms. Borrel was recently hospitalized – and that regular supervision would be preferable. In essence, regular pretrial supervision will make it easier for Ms. Borrel to get the medical care she will need over these last months of her pregnancy. Accordingly, I request that the Court modify Ms. Borrel's pretrial supervision from "strict" supervision to "regular" supervision.

MEMO ENDORSED

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In addition to pretrial supervision, Ms. Borrel is subject to the following bail conditions: a \$100,000 personal recognizance bond co-signed by three financially responsible persons; travel restricted to the Southern and Eastern District of New York, and surrender of all travel documents (with no new applications for such documents).

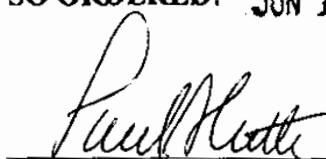
Thank you for your consideration of this matter.

Respectfully submitted,



Martin S. Cohen
Assistant Federal Defender
Tel.: (212) 417-8737

SO ORDERED: JUN 11 2008



HONORABLE PAUL A CROTTY
United States District Judge

cc: Steve Kwok, Assistant United States Attorney, via Facsimile (212) 637-2937
Luis Piedra, Pretrial Services Officer, via Facsimile (212) 805-4176